## Tab 1

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

DRYWALL ACOUSTIC LATHING AND INSULATION LOCAL 675 PENSION FUND, Individually And On Behalf of All Others Similarly Situated,

Case 1:05-cv-00294-GMS

Case No. 1:05-cv-0294 (KAJ)

Plaintiff.

V8.

MOLSON COORS BREWING COMPANY, PETER H. COORS, W. LEO KIELY, III, CHARLES M. HERINGTON, FRANKLIN W. HOBBS, RANDALL OLIPHANT, PAMELA PATSLEY, WAYNE SANDERS, ALBERT C. YATES, TIMOTHY V. WOLF, PETER SWINBURN, DAVID G. BARNES and PETER M.R. KENDALL,

Defendants.

[Caption continues on next page]

DECLARATIOPN OF METZLER INVESTMENT GMBH IN SUPPORT OF THE MOTION OF THE MOLSON COORS INSTITUTIONAL INVESTORS GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL.

## MURRAY FRANK & SAILER LLP

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Plaintiff's Counsel

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Proposed Lead Counsel

BRENT W. KLOS, Individually And On Behalf of : All Others Similarly Situated,

Plaintiff.

Case No. 1:05-cv-0317 (KAJ)

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MOLSON COORS BREWING COMPANY, PETER H. COORS, W. LEO KIELY, III, CHARLES M. HERINGTON, FRANKLIN W. HOBBS, RANDALL OLIPHANT, PAMELA PATSLEY, WAYNE SANDERS, ALBERT C. YATES, TIMOTHY V. WOLF, PETER SWINBURN, DAVID G. BARNES and PETER M.R. KENDALL.

Defendants.

DAVID SILVER, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Case No. 1;05-cv-0324 (KAJ)

VS.

MOLSON COORS BREWING COMPANY, PETER H. COORS, W. LEO KIELY III, CHARLES M. HERINGTON, FRANKLIN W. HOBBS, RANDALL OLIPHANT, PAMELA PATSLEY, WAYNE SANDERS, ALBERT C. YATES, TIMOTHY V. WOLF, PETER SWINBURN, DAVID G. BARNES and PETER M.R. KENDALL,

Defendants.

Filed 08/02/2005

We, Matthias Plewnia and Stefanie Buchmann, under penalties of perjury, declare as follows:

- We respectfully submit this Declaration in support of the motion of the 1. Molson Coors Investors Group, filed by Metzler Investment GmbH ("Metzler Investment") and Drywall Acoustic Lathing And Insulation Local 675 Pension Fund, for consolidation, appointment as lead plaintiff and approval of its selection of Milberg Weiss Bershad & Schulman LLP and Murray Frank & Sailer LLP as lead counsel.
- We are authorized signatories, or Procurists, of Metzler Investment. Metzler 2. Investment is a mutual fund company established pursuant to German law, and manages assets totaling approximately \$25 billion. Metzler Investment is headquartered in Frankfurt am Main, Germany.
- During the Class Period MI-PONDS 208 and MI-FONDS 705, funds 3. managed by Metzler Investment (the "Funds"), collectively purchased 136,100 shares of the common stock of Molson Coors Brewing Company ("Molson") on the New York Stock Exchange During the class period, none of Metzler's other funds transacted in Molson securities.
- Metzler Investment controls the Funds and acts as attorney-in-fact for them. 4. Metzler Investment has full and complete authority and discretion to purchase and sell securities for each of the Funds, and to institute legal action on their behalf, including serving as lead plaintiff in this action.
- As authorized signatories, we are fully authorized to represent the Funds in 5. all legal actions that arise from their investments, including serving as lead plaintiff in this action.
- Metzler Investment has the resources and commitment to supervise this 6. litigation and its counsel effectively, consistent with its responsibilities as a lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"). Metzler takes its

responsibilities to its members and the class seriously. Metzler is dedicated to protecting investors from breaches of securities laws by publicly traded companies and supports corporate governance reform. Metzler Investment will continue to remain informed of the status and progress of this action, the strengths and weaknesses of the case, and the prospect of settlement. To do so, Metzler Investment has designated professionals who are available to consult with counsel as needed, and in advance of any major litigation events, such as important motions, settlement discussions, trial preparation and trial. Those designated professionals have the authority to direct counsel with respect to each of those events after receiving the benefit of counsel's advice.

We understand that certain other movants have questioned whether Metzler 7. Investment can adequately carry out its duties as lead plaintiff given that its headquarters are in Germany. Such concerns are unfounded, Metzler Investment is part of Metzler Holding AG, a sophisticated, global business, with offices located in Frankfurt, Munich, Stuttgart, Tokyo, Dublin Seattle, and even within this District (Los Angeles). Representatives of Metzler Investment are prepared to personally travel wherever their presence will benefit the Class, and, when in person visits are not required, can make themselves available via telephone, e-mail and video conference.

Executed this 29 day of July, 2005

Matthias Plewnia Managing Director

Metzler Investment GmbH

Stefanie Buchmann Legal Counsel